



**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

May 15, 2025

**By ECF**

Honorable Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, New York 11201

Re: *Engesser v. McDonald*  
E.D.N.Y., Court No. 25-cv-01689 (FB) (LKE)

Dear Judge Block:

Defendant writes in response to Plaintiffs' May 15, 2025 Letter ("5/15/2025 Letter"), ECF Doc. 77, requesting a pre-motion conference regarding Plaintiffs' anticipated motion to modify and extend the Preliminary Injunction ("PI"), ECF Doc. 62.

Pursuant to this Court's Individual Motion Practices and Rules, Defendant may "serve and file a letter response, not to exceed three (3) pages within seven (7) days from service of the notification letter." § 2(A). Nonetheless, Defendant appreciates the fact that the current, agreed-upon PI expires on June 6, 2025. Defendant therefore respectfully requests that Defendant have until 5:00 pm on Monday, May 19, 2025 to submit a substantive letter response to the 5/15/2025 Letter pursuant to § 2(A) of Your Honor's Rules. Defendant further requests that the Court schedule a conference regarding the 5/15/2025 Letter for Tuesday, May 20, 2025.

Thank you for your attention to this matter.

Sincerely,

/s/ Rachel Summer  
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